



CITY OF ORANGE

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October 22, 2010

Mr. Kurt Berchtold
Executive Officer
California Regional Water Quality Control Board
Santa Ana Region
3737 Main Street, Suite 500
Riverside, CA 92501-3348

Subject: Amendment of Order No. R8-2009-0030 – Tentative Order No. R8-2010-0062

Dear Mr. Berchtold:

Tentative Order No. R8-2010-0062 proposes to modify certain land development provisions in existing Order No. R8-2009-0030 issued to the County of Orange, Orange County Flood Control District and incorporated cities of Orange County (Permittees) under the jurisdiction of the Santa Ana Regional Water Quality Control Board.

The amendments as proposed will allow the Permittees additional time to complete the update of the Model Water Quality Management Plan (WQMP) to allow for coordination with Riverside and San Bernardino Counties. The City of Orange supports the proposed amendments for the following reasons:

- Ensures adequate time to coordinate a consistent land development program between Orange, San Bernardino and Riverside counties.
- Allows time to address regional board staff comments on Model WQMP and Technical Guidance Document
- Allows for completion of a model watershed with the Model WQMP
- Allows time for training of municipal personnel and land development proponents on the new requirements
- Allows time to adequately prepare for implementation of new requirements
- Allows adequate time for input from the Permittees technical advisory committees

We hope you will consider these comments and approve Tentative Order No. R8-2010-0062 as proposed.

Sincerely,

A handwritten signature in black ink, appearing to read "Joe DeFrancesco".

Joe DeFrancesco
Public Works Director

cc: Chris Crompton, Manager, OC Public Works Environmental Resources

